

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

Case No. 1:17-mc-00151-LPS

**DECLARATION OF THOMAS PAUKOVITZ IN SUPPORT OF
VENEZUELA PARTIES' SUPPLEMENTAL LETTER BRIEF IN SUPPORT OF THEIR
MOTION TO DISQUALIFY THE SPECIAL MASTER**

I, Thomas Paukovitz, declare as follows:

1. I am a Network Administrator in the Information and Technology Department ("IT Department") at Eimer Stahl LLP.
2. I make this declaration in connection with the Venezuela Parties' Supplemental Letter Brief in Support of Their Motion to Disqualify the Special Master based upon personal knowledge.
3. In the ordinary course of business, Eimer Stahl LLP's IT Department maintains records of all phone calls to and from its employees' office lines and certain employees' mobile lines, including Nathan Eimer's, through phone service providers. These records are automatically created at the time a call occurs. As Network Administrator, I am able to access and review these phone records.
4. I reviewed the call records associated with Nathan Eimer's office line between December 28, 2022 and January 4, 2023. During that time period, there was only one call between Nathan Eimer's office line and 302-562-5232. This call occurred on January 3, 2023 at 2:02 p.m.

CST (3:02pm EST) and lasted for 48 seconds. Attached as Exhibit A to this declaration is a true and correct record of all calls between 312-660-7601 (Nathan Eimer's office phone number) and 302-562-5232 between December 28, 2022 and January 4, 2023.

5. I also reviewed the call records associated with Nathan Eimer's mobile line between December 28, 2022 and January 4, 2023. During that time period, there was only one call between Nathan Eimer's mobile line and 302-562-5232. This call occurred on January 3, 2023 at 4:26 p.m. CST (5:26 p.m. EST) and lasted for 10 minutes. Attached as Exhibit B to this declaration is a true and correct record of all calls between Nathan Eimer's mobile phone number and 302-562-5232 from December 28, 2022 and January 4, 2023.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 24th day of February, 2023, in Chicago, Illinois.

/s/ Thomas Paukovitz
Thomas Paukovitz